

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BENNETT COLLEGE,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION
)	NO. 1:19-cv-00883-MHC
THE SOUTHERN ASSOCIATION)	
OF COLLEGES AND SCHOOLS)	
COMMISSION ON COLLEGES)	
INC.,)	
)	
Defendant.)	
_____)	

**DEFENDANT THE SOUTHERN ASSOCIATION OF COLLEGES AND
SCHOOLS COMMISSION ON COLLEGES, INC.’S
NOTICE OF FILING DEPOSITION TRANSCRIPTS**

The Southern Association of Colleges and Schools Commission on Colleges, Inc. (“SACSCOC”) hereby gives notice of filing the following deposition transcripts:

1. SACSCOC 30(b)(6) (witness Donna Barrett) dated November 25, 2019 attached as Exhibit A;
2. Latonya Flamer dated September 10, 2019 attached as Exhibit B;
3. Michael Hoefer dated October 3, 2019 attached as Exhibit C;
4. Kimberly Ripberger dated September 23, 2019 attached as Exhibit D.

At Bennett's request, SACSCOC has redacted references to certain of Bennett's confidential financial information reflected in the Flamer and Ripberger depositions. Bennett has filed a joint motion to file unredacted copies of these depositions under seal. *See* Dkt. 74.¹

Respectfully submitted, this 7th day of February, 2020.

/s/ Patrick W. McKee
Patrick W. McKee
Georgia Bar No. 494325
pwmckee@mckeelaw.com
LAW OFFICE OF PATRICK W.
MCKEE, LLC
19 Spring Street
Newnan, Georgia 30263
(770) 683-8900 (phone)
(770) 683-8905 (facsimile)

/s/ Letitia A. McDonald
Letitia A. McDonald
Georgia Bar No. 489430
Lohr Beck-Kemp
Georgia Bar No. 828063
J. Matthew Brigman
Georgia Bar No. 254905
KING & SPALDING LLP
1180 Peachtree Street
Atlanta, Georgia 30309
tmcdonald@kslaw.com

¹ In connection with its Motion for Summary Judgment, SACSCOC also cites to the depositions of Ray Belton, dated November 12, 2019, SACSCOC 30(b)(6) witness Michael Hoefer, dated November 26, 2019, and Ingrid Thompson-Sellers, dated October 8, 2019. Those depositions have already been filed by Bennett. *See* Dkts. 64 (Belton); 67 (Hoefer); 71 (Thompson-Sellers).

lbeck-kemp@kslaw.com
mbrigman@kslaw.com
(404) 572-4600 (telephone)
(404) 572-5139 (facsimile)

*Attorneys for Defendant The Southern
Association Of Colleges and Schools
Commission on Colleges, Inc.*

CERTIFICATE OF SERVICE

This is to certify that I have this day I electronically filed the foregoing **THE SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS COMMISSION ON COLLEGES, INC.'S NOTICE OF FILING DEPOSITION TRANSCRIPTS** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Derin B. Dickerson
Gavin Reinke
Jahnisa T. Loadholt
Kristi Ramsay
ALSTON & BIRD, LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3424
(404) 881-7000 (phone)
(404) 881-7777 (fax)

Attorneys for Plaintiff Bennett College

This 7th day of February, 2020.

/s/ J. Matthew Brigman
J. Matthew Brigman
Georgia Bar No. 254905